

**NOTICE OF PUBLIC MEETING
OF THE
ARIZONA CRIMINAL JUSTICE COMMISSION
AND
AGENDA**

Pursuant to A.R.S. § 38-431.02, notice is hereby given to the members of the **Arizona Criminal Justice Commission** and to the general public that the **Arizona Criminal Justice Commission** will hold a meeting open to the public on **Thursday, March 30, 2006** beginning at **1:30 p.m.** at the **Arizona Criminal Justice Commission Office, 1110 W. Washington, Suite 250, Phoenix, Arizona 85007.**

Pursuant to the Americans with Disabilities Act (ADA), the Arizona Criminal Justice Commission endeavors to ensure the accessibility of its meetings to all persons with disabilities. Persons with a disability may request a reasonable accommodation, such as a sign language interpreter, by contacting the Commission Office at (602) 364-1146. Requests should be made as early as possible to allow time to arrange the accommodation.

The Commission may go into Executive Session on any of the following agenda items for the purposes of receiving legal advice pursuant to A.R.S. § 38-431.03(A)(3).

Agenda for the meeting is as follows:

- I. Call to Order and Roll Call** **Chairperson J.T. McCann**

- II. Minutes of the January 26, 2006 Meeting**
 - Approval of Minutes. **P-F-T**

- III. Executive Director's Report** **John A. Blackburn, Jr.**
 - A. Staff Update** **Info**
 - B. May meeting date change** **Info**
 - C. Strategic/Sunset planning meeting at Pow Wow** **Info**
 - D. Legislative Update** **Info**
 - E. Grants Update** **Info**

- IV. Special Prosecution Grants** **Kathy Karam**
 - A. Review, discussion, consideration and possible action on changing the gang prosecution grants from formula based to a competitive application process.** **P-F-T**

 - B. Review, discussion, consideration and possible action on combining Special Prosecution Grant funds.** **P-F-T**

- V. Arizona ICJIS Plan-Background Information** **Pat Nelson**
- Historical information on the development of the Arizona ICJIS plan and Committee Structure. **Info**

- VI. Executive Steering Committee for Integration and Information, Technology and Systems Improvement Committee Recommendations** **Pat Nelson**
- Review, discussion, consideration and possible action on the recommendations forwarded by the Executive Steering Committee for Integration and Information, Technology and Systems Improvement Committee. **P-F-T**

VII. Call to the Public

Those wishing to address the Commission need not request permission in advance. Action taken as a result of public comment will be limited to directing staff to study the matter or rescheduling the matter for further consideration and decision at a later date.

VIII. Date, Time, and Location of Next Meeting

- The next Commission meeting will be held on **Tuesday, May 23, 2006** at the Hilton Tucson El Conquistador Golf & Tennis Resort, 10000 N. Oracle Rd., Tucson, AZ 85704.

IX. Adjournment

A copy of the agenda background material provided to Commission members is available for public inspection at the Arizona Criminal Justice Commission Office, 1110 West Washington, Suite 230, Phoenix, Arizona 85007, (602) 364-1146. This document is available in alternative formats by contacting the Commission Office.

ARIZONA CRIMINAL JUSTICE COMMISSION

Request for Commission Action

Action Requested:	Type of Action Requested:	Subject:
March 30, 2006	<input checked="" type="checkbox"/> Formal Action/Motion <input type="checkbox"/> Information Only <input type="checkbox"/> Other	Minutes of the January 26, 2006 Meeting

TO: Chairperson and Commission Members

FROM: John A. Blackburn, Jr.
Executive Director

RECOMMENDATION:

The Commission approve the minutes of the Arizona Criminal Justice Commission meeting held on January 26, 2006.

DISCUSSION:

N/A

FISCAL IMPACT:

N/A

ALTERNATIVES:

Not Approve - Modify - Table

**Arizona Criminal Justice Commission
Summary of the Minutes
January 26, 2006**

A public meeting of the Arizona Criminal Justice Commission was convened on January 26, 2006 at the Arizona Criminal Justice Commission, 1110 W. Washington, Suite 250, Phoenix, Arizona 85007.

Members Present:

Robert Carter Olson, Vice-Chairperson, Pinal County Attorney
J.T. McCann, Chairperson, Chief, Flagstaff Police Department, Kevin Treadway representing
Joseph Arpaio, Maricopa County Sheriff, Jesse Locksa representing
Duane Belcher, Chairperson, Board of Executive Clemency
David Byers, Director, Administrative Office of the Courts
Clarence Dupnik, Pima County Sheriff, George Heaney representing
Tony Estrada, Santa Cruz County Sheriff
Terry Goddard, Attorney General, Cameron Holmes representing
Rod Marquardt, Chief Probation Officer, Mohave County Adult Probation, Doris Goodale representing
Tommie Cline Martin, Gila County Supervisor
Richard Miranda, Chief, Tucson Police Department, Kermit Miller representing
Ralph Ogden, Yuma County Sheriff
Dora Schriro, Director, Department of Corrections, Gary Phelps representing
Andrew P. Thomas, Maricopa County Attorney, Phil MacDonnell representing
Roger Vanderpool, Department of Public Safety, David Felix representing

Members Absent:

Dan Hughes, Chief, Surprise Police Department
Barbara LaWall, Pima County Attorney
Linda Scott, Former Judge

Staff Participating:

John A. Blackburn, Jr., Executive Director
Mary Marshall, Public Information Officer
Kathy Karam, Program Manager
Tony Vidale, Program Manager
Wendy Boyle, Executive Secretary

I. Call to Order and Roll Call

The meeting was called to order by Vice Chairperson Carter Olson at 1:35 p.m. Roll was taken and a quorum was declared present.

II. Minutes of the November 17, 2005 Meeting

Vice Chairperson Carter Olson called for a motion on the minutes. Commissioner Duane Belcher entered a motion to approve the minutes of the November 17, 2005 meeting. The motion seconded by Commissioner Ralph Ogden passed unanimously.

III. Award Presentation

Vice Chairperson Carter Olson recognized Jim Boles, former Commission member for his years of service and dedication to the Arizona Criminal Justice Commission. Mr. Boles acknowledged the award and added a noted correction on the minutes to show Mr. Boles as a voting member at the November 17 meeting. This item was for information only.

IV. Executive Director's Report

A. Staff Information

Director Blackburn introduced Bill Kalaf, Information Technology Manager as new staff to the Commission. This item was for information only.

B. Legislative Update

Mary Marshall, Public Information Officer updated the Commission on legislative issues. On the federal level, the President's budget is due in February and staff is concerned with the Byrne/JAG grant program and will continue to lobby our members from Arizona to restore funding. On the state level, immigration bills and funding mechanisms are issues that could affect law enforcement. This item was for information only.

V. Criminal Records Challenge Case #05C-002-JCA Petitioner Michael Senger

Vice Chairperson Carter Olson presented the Petitioner Case #05C-002-JCA challenging the accuracy of a criminal record which is maintained by the Arizona Department of Public Safety. Vice Chairperson Olson asked if the Respondent and the Petitioner/Counsel were present. A representative from DPS was present; however, the Petitioner/Counsel was not present. Vice Chairperson Olson acknowledged that consultation was made with the Solicitor General's Office and confirmation received that there was no actual statutory conflict of interest because the case originated in Pinal County therefore; he placed the agenda item before the Commission for consideration. Designee Jesse Locksa entered a motion that the Commission adopt the Findings of Fact in Paragraphs 1-18 as recommended by the Administrative Law Judge. The motion seconded by Commissioner Ralph Ogden passed unanimously. Designee Jesse Locksa entered a motion that the Commission adopt the Conclusions of Law in Paragraphs 1-5 as recommended by the Administrative Law Judge. The motion seconded by Commissioner David Byers passed unanimously. Designee Jesse Locksa entered a motion that the Commission accept the Administrative Law Judge's recommendation to dismiss the petition and that no further action be taken concerning the Petitioner's current criminal history record information maintained by the Arizona Department of Public Safety. The motion seconded by Commissioner Tony Estrada passed unanimously.

VI. Residential Substance Abuse Treatment (RSAT)

Kathy Karam, Program Manager discussed how Arizona would receive \$223,474 of the 9.6 million appropriated in FFY 06 for the Residential Substance Abuse Treatment Program. Ms. Karam explained that the impact on this program would be a 69% reduction from the FFY 05 appropriation. This item was for information only.

VII. Byrne/Justice Assistant Grant (JAG)

Vice Chairperson Carter Olson invited the public to address the Byrne/JAG funding. James Womack, Apache County Task Force, Kelly Clark, Navajo County Task Force and Steve Craig, Gila County Task Force addressed the funding issues and challenges of the Byrne/JAG funding. Vice Chairperson Olson thanked Mr. Womack, Mr. Clark and Mr. Craig for their comments.

A. Kathy Karam, Program Manager presented the Program Purpose Areas under the Byrne/JAG program. Commissioner Ralph Ogden motioned that the Commission continue to fund programs in the previously approved priority areas; require each grantee to demonstrate effectiveness based on performance; make funding decisions based on measured performance; allow direct BJA funding to be considered (such as 40% Direct and Methamphetamine Enforcement Initiative used to supplement the Byrne/JAG program) when making funding decisions; and require agencies to use program income to support and sustain their projects. The motion seconded by Commissioner Duane Belcher passed unanimously.

B. Kathy Karam, Program Manager presented match requirement options for the Byrne/JAG Program. Commissioner Ralph Ogden motioned that the Commission approve Option 1 that requires \$1 of match on each \$3 in federal funds for set aside projects only; and Option 3 that requires \$2 of match on each \$3 in federal funds for the remainder of the projects. The motion seconded by Designee Cameron Holmes passed unanimously.

C. Kathy Karam, Program Manager discussed the percentage of set aside funding from the Byrne/JAG Program for Criminal Justice Records Improvement Programs (CJRIP). Designee Kermit Miller motioned to continue to set-aside 5% funding (\$182,694) from the Byrne/JAG Program for the Criminal Justice Records Improvement Program. The motion seconded by Designee Cameron Holmes passed unanimously.

D. Kathy Karam, Program Manager presented to the Committee the funding projects under the \$10,000 BJA threshold. Commissioner David Byers motioned that the Commission eliminate funding projects under the \$10,000 BJA threshold. The motion seconded by Commissioner Tommie Cline Martin passed with one dissenting vote.

E. Kathy Karam, Program Manager reported on the Byrne/JAG Program Funding Level for FY07. Several options were presented and discussed. Commissioner Tony Estrada entered a motion that the Commission accept Option C, Table 5, #1 as shown on page 25 of the agenda which utilizes \$3,624,933 in federal funds, \$6,000,000 in DEA Enhancement funds, and requires \$2 in match for each \$3 in federal funds with a 5% set-aside for CJRIP. The motion seconded by Commissioner Ralph Ogden passed unanimously.

VIII. Crime Victim Assistance Program

Tony Vidale, Program Manager stated the Crime Victim Assistance Program funding level in FY06 was \$900,000. After a review of the projected revenue, Mr. Vidale proposed to continue the program level at \$900,000 for FY07. Commissioner Tony Estrada motioned that the program level for the FY07 Crime Victim Assistance Program be set at \$900,000. The motion, seconded by Commissioner Ralph Ogden passed unanimously.

IX. FY 2004 Crime Victim Services Annual Report

Tony Vidale, Program Manager presented the FY 2004 Crime Victim Services Annual Report to the Commissioners. This report represents a significant departure from previous reports as it highlights activities and services provided by agencies receiving funds from the Victim Compensation Program and Victim Assistance Program. Mr. Vidale thanked staff for their efforts in preparing the report. This item was for information only.

X. Call to the Public

Vice Chairperson Olson made a call to the public. No members of the audience addressed the Commission.

XI. Date, Time, and Location of Next Meeting

The next Arizona Criminal Justice Commission meeting will be held on Thursday, March 30, 2006 at 1:30 p.m. at the Arizona Criminal Justice Commission, 1110 W. Washington, Suite 250, Phoenix, Arizona 85007.

VII. Adjournment

The meeting was adjourned 3:10 p.m.

Respectfully submitted,

John A. Blackburn, Jr.
Executive Director

Audio recording is available upon request.

ARIZONA CRIMINAL JUSTICE COMMISSION

Request for Commission Action

Action Requested:	Type of Action Requested:	Subject:
March 30, 2006	<input type="checkbox"/> Formal Action/Motion <input checked="" type="checkbox"/> Information Only <input type="checkbox"/> Other	Executive Director's Report-Staff Update

TO: Chairperson and Commission Members

FROM: John A. Blackburn, Jr.
Executive Director

RECOMMENDATION:

Information Only.

DISCUSSION:

The Director will introduce new staff to the Commission.

FISCAL IMPACT:

N/A

ALTERNATIVES:

N/A

ARIZONA CRIMINAL JUSTICE COMMISSION

Request for Commission Action

Action Requested:	Type of Action Requested:	Subject:
March 30, 2006	<input type="checkbox"/> Formal Action/Motion <input checked="" type="checkbox"/> Information Only <input type="checkbox"/> Other	Executive Director's Report-May Meeting

TO: Chairperson and Commission Members

FROM: John A. Blackburn, Jr.
Executive Director

RECOMMENDATION:

Information Only.

DISCUSSION:

Director Blackburn will update the Commission on the May meeting date in Tucson.

FISCAL IMPACT:

N/A

ALTERNATIVES:

N/A

ARIZONA CRIMINAL JUSTICE COMMISSION

Request for Commission Action

Action Requested:	Type of Action Requested:	Subject:
March 30, 2006	<input type="checkbox"/> Formal Action/Motion <input checked="" type="checkbox"/> Information Only <input type="checkbox"/> Other	Executive Director's Report-Strategic/ Sunset Planning Meeting

TO: Chairperson and Commission Members

FROM: John A. Blackburn, Jr.
Executive Director

RECOMMENDATION:

Information Only.

DISCUSSION:

Director Blackburn will update the Commission on a Strategic/Sunset Planning Meeting at the annual Law Enforcement Pow Wow in Flagstaff.

FISCAL IMPACT:

N/A

ALTERNATIVES:

N/A

ARIZONA CRIMINAL JUSTICE COMMISSION

Request for Commission Action

Action Requested:	Type of Action Requested:	Subject:
March 30, 2006	<input type="checkbox"/> Formal Action/Motion <input checked="" type="checkbox"/> Information Only <input type="checkbox"/> Other	Executive Director's Report-Legislative Update

TO: Chairperson and Commission Members

FROM: John A. Blackburn, Jr.
Executive Director

RECOMMENDATION:

Information Only.

DISCUSSION:

Director Blackburn will update the Commission on the legislative session.

FISCAL IMPACT:

N/A

ALTERNATIVES:

N/A

ARIZONA CRIMINAL JUSTICE COMMISSION

Request for Commission Action

Action Requested:	Type of Action Requested:	Subject:
March 30, 2006	<input type="checkbox"/> Formal Action/Motion <input checked="" type="checkbox"/> Information Only <input type="checkbox"/> Other	Executive Director's Report-Grants Update

TO: Chairperson and Commission Members

FROM: John A. Blackburn, Jr.
Executive Director

RECOMMENDATION:

Information Only.

DISCUSSION:

Director Blackburn will update the Commission on the Byrne/JAG and other grants.

FISCAL IMPACT:

N/A

ALTERNATIVES:

N/A

ARIZONA CRIMINAL JUSTICE COMMISSION

Request for Commission Action

Action Requested:	Type of Action Requested:	Subject:
March 30, 2006	<input checked="" type="checkbox"/> Formal Action/Motion <input type="checkbox"/> Information Only <input type="checkbox"/> Other	Gang Prosecution Grants

TO: Chairperson and Commission Members

FROM: Kathy Karam, Program Manager
Drug Control and Systems Improvement

RECOMMENDATION:

The Commission approve the manner in which the Gang Prosecution funds are awarded.

DISCUSSION:

The Drug, Gang and Violent Crime Committee will meet and make a recommendation to the Commission. See attached.

FISCAL IMPACT:

Significant to recipient agencies

ALTERNATIVES:

Not Approve - Modify - Table

Gang Prosecution

Enhanced gang prosecution funds were initially appropriated to the Arizona Criminal Justice Commission during the 1994 Forty-first Legislature through two bills:

- Chapter 200 SB 1291 established a Street Gang Enforcement Revolving Fund Account (A.R.S. § 41-191.07). This fund contains language appropriating 25 percent of funds to the Attorney General and 75 percent to the County Attorneys. In addition, the law states the funds are to be used to provide either personnel or training of prosecutors and law enforcement personnel in the area of street gang enforcement and prosecution or for the investigation and prosecution of any offense described in this section. The dollar amount appropriated to this fund in FY 95 and FY 96 was \$430,000. These funds are exempt from lapsing.
- Chapter 3 HB 2003 appropriated \$670,000 from the General Fund for FY 95 and again in FY96, to enhance prosecution of any offense relating to criminal street gangs. These funds can be distributed to state, county and municipal prosecution offices for the purposes of training and prosecuting offenses relating to criminal street gangs. These funds are lapsing.

In FY 1997 the street gang enhancement funds were eliminated pending the Joint Oversight Committee on Anti-Gang Enforcement and Prosecution Programs program review, funding was restored through an appropriation to ACJC but was reduced to \$500,000. An additional \$500,000 was appropriated to the Street Gang Enforcement fund bringing the total to \$1,000,000.

In FY 2002, the Legislature was faced with severe budget cuts and directed agencies to cut their General Fund budgets. The Legislature specified the dollar amount of the cuts but allowed the agency to identify the specific program to be cut. The Commission chose to cut the Street Gang Prosecution program. In order to continue the programs at the same level, the Drug and Gang Enforcement Account (DEA) funds were used to supplement the programs at \$1,000,000 for both FY 2002 and 2003. The Commission continued to award funds to the Attorney General and County Attorneys based on the original formula.

In FY 2004, the DEA supplemental funds were discontinued and \$603,200 in appropriated funds was used to fund the program. The program size has remained at that level.

Agency	FY 1997- 2001				FY 2002 & 2003		FY 2004 - 2006	
	Street Gang Fund	Approp	Total	%	Approp & DEA	%	Approp	%
Attorney General	125,000	49,300	174,300	17.43	174,300	17.43	105,138	17.43
Maricopa CA	228,805	272,000	500,805	50.08	500,805	50.08	302,083	50.08
Pima CA	106,195	128,700	234,895	23.49	234,895	23.49	141,692	23.49
Rural CA*	5,000	50,000	55,000	5.5	55,000	5.5	33,176	5.5
Rural CA Emergency	35,000	0	35,000	3.5	35,000	3.5	21,111	3.5
TOTAL	500,000	500,000	1,000,000	100	1,000,000	100	\$603,200	100

Rural Emergency funds if not used by March 1st are re-allocated to Maricopa 68% and Pima 32%.

*Rural County Attorney's \$5,000/\$3, 016 each except for Coconino and Yavapai who have declined to participate.

Currently the Gang Prosecution funds are appropriated as a lump-sum appropriation and included with the other Special Prosecution grants. Since there was no guidance by the Legislature at the time of the budget reductions, the Commission may designate the Street Gang Enforcement fund appropriation as the funds cut in FY 2002. This would eliminate the requirement of distributing Gang Prosecution funds based on a formula.

Staff surveyed each of the County Attorney's offices this month to determine if there are gang problem in their counties and if they had statistical data supporting street gang prosecution activity. The majority of the rural counties do not have gang prosecution data or staff specifically assigned to street gang prosecution cases. The following are the results:

- 4 counties and the Attorney General responded that they **have gang problems** (Maricopa, Mohave, Pima and Yuma). These counties also report gang prosecution statistics on the ACJC quarterly reports. The 2003 Gang Survey compiled by the Statistical Analysis Center (SAC) confirms this information. The law enforcement agencies in these counties report that gangs are a medium to serious public safety issue.
- 4 rural counties reported that they have **gang problems localized** on the tribal reservations out of their jurisdiction (Apache, Gila, Navajo and Pinal). These counties do not report gang prosecution statistics on the ACJC quarterly reports. The 2003 Gang Survey of the law enforcement agencies in Gila and Pinal report that gangs are not one of the most serious public safety issues, while Apache and Navajo County Sheriff's Offices see this as a medium-serious public safety issue, but the local agencies within the county respond that gangs are not a public safety issue.
- 5 rural counties reported **no gang problems**. (Cochise, Greenlee, Graham, La Paz, Santa Cruz). These counties do not report gang prosecution statistics on the ACJC quarterly reports. The 2003 Gang Survey of law enforcement agencies in these counties confirms this information.

The legislative intent of the street gang prosecution funds states that the "funds should be used for training and prosecuting offenses relating to criminal street gangs". It has been difficult justifying funding to counties that do not have a gang problem. It is recommended that the manner in which the Commission currently awards these funds be reviewed and perhaps changed to a competitive process. This would place the limited dollars where they are needed and meet the original legislative intent.

ARIZONA CRIMINAL JUSTICE COMMISSION

Request for Commission Action

Action Requested:	Type of Action Requested:	Subject:
March 30, 2006	<input checked="" type="checkbox"/> Formal Action/Motion <input type="checkbox"/> Information Only <input type="checkbox"/> Other	Special Prosecution Grants

TO: Chairperson and Commission Members

FROM: Kathy Karam, Program Manager
Drug Control and Systems Improvement

RECOMMENDATION:

The Commission approve combining the Special Prosecution funds and allowing the County Attorney Offices to apply competitively under the four (4) categories; Aggravated Domestic Violence Prosecution, Gang Prosecution, Obscenity Prosecution, and Sexual Exploitation Investigation/Prosecution and the awards be based on demonstrated need using statistical data and documented performance.

DISCUSSION:

The Drug, Gang and Violent Crime Committee will meet and make a recommendation to the Commission. See attached.

FISCAL IMPACT:

Significant to recipient agencies

ALTERNATIVES:

Not Approve - Modify - Table

Special Prosecution Grants

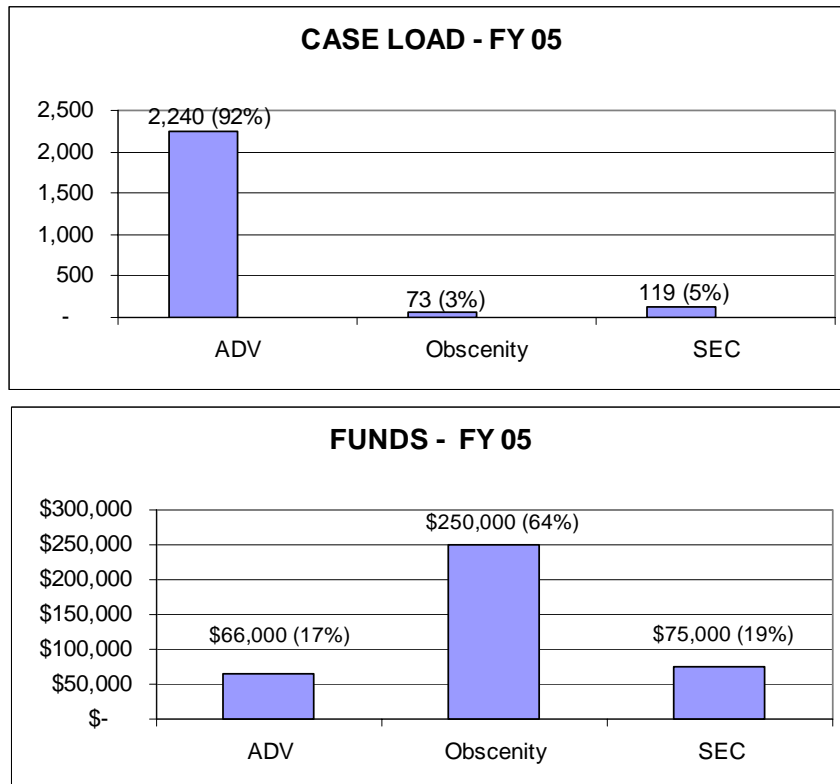
Within each program area, ACJC has awarded small grants based on the original legislation for the following purposes:

Aggravated Domestic Violence Prosecution (ADV) (start 1998):	\$ 66,000
Gang Prosecution (start 1995):	\$603,200
Obscenity Prosecution (start 1997):	\$250,000
Sexual Exploitation of Children Investigation/Prosecution (SEC) (start 1998):	<u>\$ 75,000</u>
TOTAL:	\$994,200

These grants have been awarded competitively except for the Gang Prosecution grant as discussed in the previous agenda item.

For several years, the Commission has been awarded a **lump sum appropriation** totaling \$994,200 for "Special Prosecution Grants" rather than individual appropriations for each program. However, funds must be spent according to the original intent and restrictions of the original legislation.

Staff has reviewed the manner in which these grants have been awarded over the past several years and believe that there may be a more effective way to utilize the limited grant funds. Based on past proposals, there appears to be a greater need in some areas than others; however, limited resources restrict the amount of funds available to meet those needs. Combining the funds will allow greater flexibility in funding decisions to meet the needs of the state.



Staff recommends that the Commission consider combining these funds and allowing the County Attorney Offices to apply for grant funds for the above four categories based on demonstrated need using statistical data and documented performance. Staff would ensure that the original legislative intent and restrictions would still be met within each program area.

ARIZONA CRIMINAL JUSTICE COMMISSION

Request for Commission Action

Action Requested:	Type of Action Requested:	Subject:
March 30, 2006	<input type="checkbox"/> Formal Action/Motion <input checked="" type="checkbox"/> Information Only <input type="checkbox"/> Other	Arizona ICJIS Plan Background Information

TO: Chairperson and Commission Members

FROM: Pat Nelson, Program Manager
Criminal Justice Records

RECOMMENDATION:

Information Only.

DISCUSSION:

Pat Nelson, Program Manager will review the Arizona ICJIS Plan and committee structure to support integration efforts for agencies statewide.

- IBM / Northrop Studies
- Committee Structure

FISCAL IMPACT:

N/A

ALTERNATIVES:

N/A

ARIZONA CRIMINAL JUSTICE COMMISSION

Request for Commission Action

Action Requested:	Type of Action Requested:	Subject:
March 30, 2006	<input checked="" type="checkbox"/> Formal Action/Motion <input type="checkbox"/> Information Only <input type="checkbox"/> Other	Executive Steering Committee for Integration and Information, Technology and Systems Improvement Committee Recommendations

TO: Chairperson and Commission Members

FROM: Pat Nelson, Program Manager
Criminal Justice Records

RECOMMENDATION:

The Arizona Criminal Justice Commission approve the recommendations put forth by the Policy Team for the statewide efforts of the Arizona Integrated Criminal Justice Information System (ICJIS) strategic plan and development of a funding support model for integration projects.

DISCUSSION:

On March 23, 2006, the Executive Steering Committee for Integration and the Information, Technology and Systems Improvement Committee met jointly to make a recommendation to the Commission. Recommendations included the strategic direction for integration projects in the state as well as funding strategies to address development and on-going support of projects.

FISCAL IMPACT:

N/A

ALTERNATIVES:

Not Approve - Modify - Table